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January 21, 2020

Ms. Ammyanna Williams
Program Management Organization
Surveillance and Broadcast Services
Federal Aviation Administration
600 Independence Avenue S.W.
Washington, DC 20591

Re: Development of ADS-B PIREP Standards for ADS-B V3, DO-260C

Dear Ms. Williams,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, would like to express our support and stress the importance of including "ADS-B PIREP" standards in the ADS-B V3 minimum operational performance standards for 1090 MHz ADS-B. The work underway in the Combined Surveillance Committee, and SC-186, SC-206, and SC-209, touch on critical weather capabilities that comprise "ADS-B Wx." Expanding the work for DO-260C to include ADS-B PIREPs as part of ADS-B Wx, would be highly beneficial to all of aviation. We believe the FAA should support this effort and further leverage the benefits ADS-B can provide to general aviation.

As you may be aware, attempts to fly by visual references in instrument conditions is a leading cause of fatal general aviation accidents and the leading cause of weather-related accidents. Increasing PIREPs, by allowing their submission via electronic means, will greatly expand the amount of weather information available to pilots, air traffic control, and forecasters. AOPA surveys and research conducted by the FAA indicates pilots would submit more PIREPs if they could do so electronically, such as via ADS-B.

We noted the importance of working towards the downlink of PIREPs via ADS-B in our 2019 letter to the FAA's Air Traffic Organization Top 5 Safety Program. More than 80% of aircraft owners have adopted 1090 MHz ADS-B systems, and it makes sense to leverage this prevalent system and the work already underway for ADS-B Wx, which is founded on this technology.

This concept and recommendation echo previous NTSB safety recommendations to the FAA that called for ADS-B systems to have the ability to transmit weather information from the aircraft to the ground. We believe current technology and system adoption points to this being the right time to move forward on ADS-B PIREP by ensuring the standard for ADS-B V3, to which future systems will be built by avionics manufacturers, includes ADS-B Wx.

We offer our continued support to work closely with FAA, RTCA, the special committees involved, and to participate actively in this effort. Thank you for your efforts to improve the availability of a new generation of weather capability to the aviation community. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,

Rune Duke
Senior Director, Airspace and Air Traffic